

EXHIBIT A

ANAND PRINTING MACHINERY, INC., §

Plaintiff, §

v. §

ROBERT ALEXANDER, JOHN
McBRIAN, EQUUS FERRUM, INC., and
IRONHORSE RECOVERY, LLC, §

Defendants. §

CAUSE No. 4:20-CV-01249

DECLARATION OF JOHN McBRIAN IN SUPPORT OF
DEFENDANT IRONHORSE RECOVERY, LLC'S
MOTION TO VACATE ENTRY OF DEFAULT AND
MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS

I, John McBrian, state and declare as follows:

1. I was the Managing Member of Ironhorse Recovery, LLC. I am competent and authorized to make this declaration in support of Ironhorse's Motion to Vacate Entry of Default and Motion to Dismiss for Insufficient Service of Process.
2. Before it ceased operations, Ironhorse was a limited liability company organized under the laws of the State of Texas and doing business in Montgomery County, Texas.
3. I do not live and have never lived at 244 Dawns Edge in Montgomery, Texas. I have never done business at that address. To my knowledge, the address does not exist.
4. I have never been served with a Summons or any other papers on behalf of Ironhorse in connection with this lawsuit in person, by mail, or otherwise. I have received no communications from the Texas Secretary of State in connection with this lawsuit. I have never been asked to accept service of any papers on behalf of Ironhorse in connection with this lawsuit.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on the 19 day of Sept, 2020.

John McBrian